

BEFORE THE JUDICIAL QUALIFICATIONS COMMISSION  
STATE OF FLORIDA

INQUIRY CONCERNING A JUDGE  
NO. 02-466, JUDGE JOHN RENKE III

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: SC03-1846  
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**NOTICE OF TAKING DEPOSITIONS**

TO: Scott K. Tozian, Esquire  
Smith & Tozian, P.A.  
109 North Brush Street  
Suite 200  
Tampa, Florida 33602-4163

PLEASE TAKE NOTICE that the Florida Judicial Qualifications Commission, by and through its undersigned Special Counsel and pursuant to Judicial Qualifications Commission Rule 12(a) and Fla. R. Civ. P. 1.310, will take the depositions duces tecum of the following:

Deponent	Date & Time	Location
Mr. John T. Hebert The Mallard Group, Inc. 2861 Executive Drive, Suite 100 Clearwater, Florida 33762	June 30, 2005 11:00 a.m.	Judy Moukazis & Associates Court Reporters Annex 7218 Massachusetts Avenue New Port Richey, Florida 34653
Direct Web, Inc. c/o John L. Tevlin 5210 South Lois Avenue Tampa, Florida 33611	June 30, 2005 1:00 p.m.	Judy Moukazis & Associates Court Reporters Annex 7218 Massachusetts Avenue New Port Richey, Florida 34653

before Judy Moukazis & Associates, Notaries Public, at Judy Moukazis & Associates, Court Reporters Annex, 7218 Massachusetts Avenue, New Port Richey, Florida, or

such other person before whom depositions may be taken.

The examination of the deponents may continue from day to day until completed or may be adjourned to be reconvened at such later date as may be established therefore by those in attendance at such depositions.

PLEASE BE GOVERNED ACCORDINGLY.

Respectfully submitted,



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MARVIN E. BARKIN  
Florida Bar No. 3564  
MICHAEL K. GREEN  
Florida Bar No. 763047  
TRENAM, KEMKER, SCHARF, BARKIN  
FRYE, O'NEILL & MULLIS, P.A.  
2700 Bank of America Plaza  
101 East Kennedy Boulevard  
Post Office Box 1102  
Tampa, Florida 33601-1102  
(813) 223-7474 (Telephone)  
(813) 229-6553 (Fax)  
Special Counsel for  
Florida Judicial Qualifications Commission

and

THOMAS C. MACDONALD, JR.  
Florida Bar No. 049318  
General Counsel  
Florida Judicial Qualifications Commission  
1904 Holly Lane  
Tampa, FL 33629  
(813) 254-9871 (Telephone)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY a true and correct copy of Notice of Taking Depositions has been furnished by U.S. Mail to **Scott K. Tozian, Esquire**, Smith & Tozian, P.A., 109 North Brush Street, Suite 200, Tampa, Florida 33602-4163 on this 17th day of June, 2005.

  
\_\_\_\_\_  
Attorney

BEFORE THE JUDICIAL QUALIFICATIONS COMMISSION  
STATE OF FLORIDA

INQUIRY CONCERNING A JUDGE  
NO. 02-466, JUDGE JOHN RENKE III

SC03-1846

**SUBPOENA DUCES TECUM FOR DEPOSITION**

**THE STATE OF FLORIDA:**

**TO:** Mr. John T. Hebert  
The Mallard Group, Inc.  
2861 Executive Drive, Suite 100  
Clearwater, Florida 33762

YOU ARE HEREBY COMMANDED to appear before Judy Moukazis & Associates, a commissioner authorized by law to take depositions, at the **offices of Judy Moukazis & Associates, 7218 Massachusetts Avenue, New Port Richey, Florida 34653** on **June 30, 2005 at 11:00 a.m.** and to have with you at that time and place the documents responsive to the requests set forth in Exhibit A attached hereto.

If you fail to appear as specified, you may be in contempt of Court. You are subpoenaed to appear by the following attorneys, and unless excused from this subpoena by these attorneys or the Court, you shall respond to this subpoena as directed.

DATED this 17th day of June 2005.

Judicial Qualifications Commission

  
Michael K. Green

MICHAEL K. GREEN  
Florida Bar No. 763047  
TRENAM, KEMKER, SCHARF, BARKIN,  
FRYE, O'NEILL & MULLIS,  
Professional Association  
101 E Kennedy Blvd., Suite 2700  
Tampa, Florida 33602  
(813) 223-7474  
(813) 229-6553 Facsimile  
Special Counsel for the  
Judicial Qualifications Commission

**AMERICAN DISABILITIES ACT (ADA)**

If you are a person with a disability who needs a reasonable accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Trenam Kemker, 2700 Bank of America Plaza, 101 East Kennedy Boulevard, Tampa, Florida 33602, (813) 223-7474, within two (2) working days of your receipt of this subpoena; if you are hearing or voice impaired, call 1-800-955-8771.

## EXHIBIT "A"

1. All documents, electronic or otherwise, reflecting, referring or relating to any transactions, dealings or communications amongst or between John K. Renke, II, John K. Renke, III, the John K. Renke, III campaign for judicial office in 2002 (the "Renke Campaign") or any other person affiliated or associated with them and Jack Hebert or Mallard Group or any other person affiliated or associated with them.
2. All contracts or agreements amongst or between Jack Hebert or the Mallard Group and John Renke, III, John K. Renke, II, in any way related to the aforementioned campaign.
3. All documents, electronic or otherwise, reflecting all services rendered by the Mallard Group or Jack Hebert for or on behalf of the Renke Campaign and all payments made to the Mallard Group or Jack Hebert for or on behalf of the Renke Campaign.
4. All flyers, brochures, mailers or other documents designed, printed or mailed by the Mallard Group or Jack Hebert for or on behalf of the Renke campaign.
5. All documents, electronic or otherwise, reflecting, referring or relating to any transactions, dealings, services provided, work performed or communications for or to or amongst or between Jack Hebert and the Mallard Group and the Pasco County Republican Party or the Pasco County Republican Executive Committee in 2002.
6. All documents, electronic or otherwise, reflecting, referring or relating to the campaign mailer ordered and/or paid for by the Republican Party of Pasco County or the Pasco County Republican Executive Committee distributed during the 2002 campaign which endorsed five candidates for judicial office, including John Renke, III, including without limitation, all bills, invoices, mailing costs and expenses, mailing lists and any other documents related thereto.
7. All documents, electronic or otherwise, reflecting, referring or relating to any transaction, dealings, agreements or communications amongst or between Jack Hebert or the Mallard Group and Direct Web, Inc. or any person affiliated or associated with Direct Web, Inc. in 2002, including e-mails, receipts, memoranda, contracts or letters (formal or informal).

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**SUBPOENA DUCES TECUM FOR DEPOSITION**

**THE STATE OF FLORIDA:**

**TO:** Direct Web, Inc.  
c/o John L. Tevlin  
5210 South Lois Avenue  
Tampa, Florida 33611

YOU ARE HEREBY COMMANDED to appear before Judy Moukazis & Associates, a commissioner authorized by law to take depositions, at the **offices of Judy Moukazis & Associates, 7218 Massachusetts Avenue, New Port Richey, Florida 34653** on **June 30, 2005 at 1:00 p.m.** and to have with you at that time and place the documents responsive to the requests set forth in Exhibit A attached hereto.

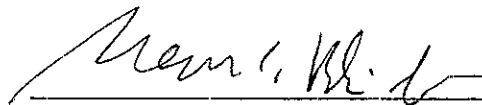
If you fail to appear as specified, you may be in contempt of Court. You are subpoenaed to appear by the following attorneys, and unless excused from this subpoena by these attorneys or the Court, you shall respond to this subpoena as directed.

The matters upon which a designated representative shall be expected to testify include the following:

1. Dealings with Mallard Group during the 2002 elections.
2. Mailings done for the Pasco County Republican Party or the Pasco County Republican Executive Committee in 2002.
3. Payments made and costs incurred by the Pasco County Republican Party or Pasco County Republican Executive Committee for marking campaign flyer(s) or brochures during the 2002 election campaign.

DATED this 17th day of June, 2005.

Judicial Qualifications Commission

  
Michael K. Green

MICHAEL K. GREEN  
Florida Bar No. 763047  
TRENAM, KEMKER, SCHARF, BARKIN,  
FRYE, O'NEILL & MULLIS,  
Professional Association  
101 E. Kennedy Blvd., Suite 2700  
Tampa, Florida 33602  
(813) 223-7474  
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Special Counsel for the  
Judicial Qualifications Commission

AMERICAN DISABILITIES ACT (ADA)

If you are a person with a disability who needs a reasonable accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Trenam Kemker, 2700 Bank of America Plaza, 101 East Kennedy Boulevard, Tampa, Florida 33602, (813) 223-7474, within two (2) working days of your receipt of this subpoena; if you are hearing or voice impaired, call 1-800-955-8771.

## EXHIBIT "A"

1. All documents, electronic or otherwise, reflecting, referring or relating to the mailing or distribution of campaign flyer(s) or brochure(s) for or on behalf of the Pasco County Republican Party or the Pasco County Republican Executive Committee during the 2002 campaign.

2. All documents, electronic or otherwise, reflecting, referring or relating to the campaign flyer or brochure mailed out by Direct Web, Inc. for or on behalf of the Pasco County Republican Party during the 2002 election campaign which endorsed candidates for judicial office in Pasco and Pinellas Counties, including without limitation, the mailing list(s) used, the cost of such mailing in Pasco and Pinellas County, the payments made for the mailing and all costs incurred by anyone.

3. All contracts, dealings or communications amongst or between Direct Web, Inc. or any person affiliated or associated with Direct Web, Inc. and the Pasco County Republican Party, the Pasco County Republican Executive Committee, John K. Renke, II, Hugh Townsend, Scott Factor, John K. Renke, III, William Bunting or any other person affiliated or associated with the foregoing persons in 2002 and 2003.